UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

ANSELL GRIMM & AARON, P.C. Joshua S. Bauchner, Esq. Ansell Grimm & Aaron, P.C. 365 Rifle Camp Road Woodland Park, New Jersey 07424 Attorneys for Harary Group, LLC

In re:

MYINT KYAW, a/k/a JEFFREY WU,

Debtor.

Case No.: 820-72407-REG

Chapter 11

Honorable Robert E. Grossman,

U.S.B.J.

HARARY GROUP, LLC,

Plaintiff,

v.

MYINT KYAW, a/k/a JEFFREY WU,

Defendant.

Adv. Pro. No. 8:20-08162-REG

Hearing Date: May 24, 2021

## PLAINTIFF'S MOTION TO COMPEL DISCOVERY

Plaintiff, Harary Group, LLC, ("Plaintiff") by and through the undersigned counsel and pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 7037 of the Federal Rules of Bankruptcy Procedure, hereby submits this Notice of Motion to Compel Discovery, Memorandum of Law in Support of its Motion, and Certification of Anthony J. D'Artiglio, Esq. As set forth in the motion, Plaintiff requests that the Court compel Defendant, Myint Kyaw, a/k/a Jeffrey Wu to produce and respond to Plaintiff's Discovery Demands, extend the Discovery End Date, and grant such other and further relief to which Plaintiff may show itself justly entitled.

Case 8-20-08162-reg Doc 12 Filed 05/07/21 Entered 05/07/21 16:55:43

Dated: May 7, 2021 Respectfully submitted,

## ANSELL GRIMM & AARON, P.C.

By: <u>/s/ Anthony J. D'Artiglio</u> Anthony J. D'Artiglio, Esq.

> 365 Rifle Camp Road Woodland Park, New Jersey 07424

Tel: 973.247.9000

Email: ajd@ansellgrimm.com

Attorneys for Plaintiff, Harary Group, LLC